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# THE NATIONAL INSTITUTE FOR URBAN SEARCH AND RESCUE

Date: June 17, 1994

Mr. Wm. F. Caton  
Acting Secretary  
Federal Communications Commission  
Office of the Secretary  
1919 M Street, NW - Room 222  
Washington, DC 20554

In the Matter Of

Reply Comments

Amendment of the Commission's Rules	)	CC Docket 92-166
to Establish Rules and Policies Pertaining	)	FCC 94-11
to a Mobile Satellite Service in the	)	
1610 - 1625 / 2483.5 - 2500 Mhz	)	
Frequency Bands	)	

Issues and Concerns

The National Institute for Urban Search and Rescue wishes to address a matter of vital public interest that we had understood had long been a part of the cited rulemaking. Namely the provision of emergency MSS capabilities to serve the public in times of disaster, emergency or individual distress. In reading the document as circulated for comments and reply comments, we find no reference to the needs of large segments of the population during catastrophic disasters, such as earthquakes, flood, hurricanes and fires. Catastrophic events will be discussed in the section Emergency Response Services. Individual needs will be addressed by discussion under Distress Alerting and Locating Systems.

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Emergency Response Services

The provision of priority communications via satellite in times of disaster and catastrophe is obvious. However these applications are not addressed other than in paragraph 5 (pages 44 and 45). These applications are surely in the public

interest, but the policy of the FCC toward providing these services to the public is silent. As a participant in the Public Hearings of Vice President Gore while he was the chair of the Science and Technology and Space Committees, these matters were thoroughly discussed and agreed. What has caused all this work to be dropped out in the final revision? This is NOT in the public interest and such action by the FCC flies in the face of the entire 10 year process that has taken us to this crucial point. All segments of the lifesaving, disaster and public safety communities in the United States will be outraged by this development. Especially since the format and wording of this final rulemaking appear so innocuous that rescue forces are caught unaware by the lawyers language.

Satellite communications (MSS Capabilities) could solve the basic problems haunting emergency communications today. Degradation and interruption of land based communications systems, coupled with the lack of interoperable communications is making a mockery of any command and control of major disasters. This lack is costing millions, even billions of wasted dollars in inefficient disaster response. The MSS capabilities would solve this problem!

1. On an emergency basis they should be ready to provide: Priority Communications for Emergency Services and Lifesaving Search & Rescue.
2. Seamless, transparent communications between users of different MSS systems.
3. Standardized protocols for routing of data messages.

**Isn't this what the National Information Structure is all about? Is this Rulemaking deliberately, or accidentally, flying in the face of all the hard work of the National Performance Review?**

### **Distress Alerting & Locating Systems Including 911**

The MSS has the potential to increase the capability to provide much greater lifesaving because of its increased coverage; two-way communications; greater location accuracy, positive identification of the party in distress and; potentially lower user equipment cost. However to provide this increased benefit to search and rescue and 911 emergency response, the following is needed by the response organizations but is not addressed in the proposed rulemaking:

- 1. Means of routing of the distress message to the appropriate responder**
- 2. Identification of the calling party.**
- 3. Location of the calling party**
- 4. Standard format for SAR distress and #911 messages. (There will possible be many manufacturers of such hardware. *Standards* must be set now.)**
- 5. Ability to return calls to the distressed party.**

**Specifically in the case of 911, about only 72% of the US is covered by some type of 911 service. There is an opportunity for MSS to cover this gap in the public safety system through use of MSS equipment and services.**

### **Recommendations for Corrective Action**

**In the introduction to the subject NPRM the FCC includes in its enumeration of possible applications of the MSS for position location, search and rescue communications and disaster management communications. These applications are surely in the public interest. However, other than in the most general terms, the policy of the FCC toward providing these services to the public is not addressed. Several points need to be discussed in relation to the FCC's stated position; the intent of the MSS providers to provide these services; and the expectation of the general public whose welfare all parties should address.**

**Of equal or greater importance is the cost savings that the provision of these capabilities could provide, and contrarily, the high cost of disaster and lifesaving operations if the MSS providers do not agree to these actions for the public good. In their filings for licenses it is understood that most of the potential providers of MSS indicated they would provide distress and safety services as in part justification for frequency authorization. This is a matter of record in FCC filings from various parties including Motorola, Ellipsat, TRW, LORAL, and Constellation Communications. In fact, to quote Motorola "As a satellite-based communications system, IRIDIUM essentially will be disaster proof. It can be used in emergency situations such as earthquakes, hurricanes, tornadoes, and floods."**

**We suggest the following immediate actions:**

- 1. The FCC Proposed Rule Making shall address the issues of emergency response and emergency communications in a manner to all the MSS providers to go forward without delay IF the following is agreed:**
- 2. The FCC shall require the MSS providers to address the above issues in their design and implementation. If necessary a national coordinating committee should be formed to address the issues of interoperability, routing of distress calls and standardization of protocols. This could be done in conjunction with the efforts of the NII.**
- 3. If the potential liability of MSS providers is considered an issue, it should be included in the rule or referred to the Congress for action. The US Coast Guard, the US Air Force, the National Park Service all have plentiful rules, and case studies of indemnifying their processes against like concerns. This perceived problem should not be allowed to interfere with the common good of the public. It would, indeed, be a**

**shame to have lawyers force the 21st Century technology into only providing Shopping TV via satellite.**

**This is a most urgent issue that has the potential to again stop the implementation of satellite communications availability for the public good. Please address these matters with the care and ethical thought that is needed . Thank you and Press On!**

A handwritten signature in black ink that reads "Lois Clark McCoy". The signature is written in a cursive, flowing style.

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